PUBLIC SUBMISSION

As of: 3/10/21 2:44 PM
Received: March 08, 2021
Status: Pending_Post
Tracking No. km1-dp78-gg4m
Comments Due: March 08, 2021
Submission Type: Web

Docket: NRC-2021-0036
Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

Comment On: NRC-2021-0036-0001
Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

Document: NRC-2021-0036-DRAFT-0047
Comment on FR Doc # 2021-02357

Submitter Information

Email: kevin@beyondnuclear.org
Organization: Beyond Nuclear and Don't Waste Michigan

General Comment

(Beyond Nuclear's written comment #1)

I would like to call your attention to a report written by my co-worker Paul Gunter, Reactor Oversight Project Director at Beyond Nuclear. The report is entitled "Leak First, Fix Later: Uncontrolled and Unmonitored Radioactive Releases from Nuclear Power Plants." The report is posted online here: <http://www.beyondnuclear.org/reports/>. Palisades has had so many tritium leaks, that Palisades got its own chapter! This radioactive contamination of the Palisades site should be completely cleaned up. "Natural attenuation," as the nuclear power industry and NRC euphemistically call it, is not acceptable. For the radioactive contamination to flow into Lake Michigan, or inland aquifers, over time, does not mean it will dilute to "safe" levels or concentrations. In fact, such artificial radioactivity flowing into Lake Michigan means the accumulation of radioactive risks in the Great Lakes. The Great Lakes is not a radioactive industrial sewer or cesspool, for Palisades to discharge or leak its hazardous radioactive pollution into! Once in Lake Michigan, hazardous artificial tritium, and other radioactive contamination, can and will contaminate drinking water supplies, such as for South Haven and other shoreline communities, drawn from Lake Michigan. Artificial radioactivity, far from "diluting" to "safe levels" in Lake Michigan, will also instead bio-accumulate, bio-concentrate, and bio-magnify, up the food chain. Unsuspecting humans are at the top of the food chain, and will be harmed with the most concentrated, hazardous doses thereby. Artificial radioactive contamination from Palisades flowing into inland aquifers over time would also increase the concentration of hazardous substances, such as tritium, in yet another potential drinking water supply. The Palisades Park resort community, immediately adjacent to the Palisades nuclear power plant, draws its potable water supply for drinking, cooking, washing, bathing, etc. from wells that tap area aquifers. Palisades' Nuclear Decommissioning Trust Fund, already woefully inadequate after being looted by Consumers Energy and Entergy in 2007, to the tune of $316 million, from which it has never recovered, should not be allowed any further looting or draining away for non-decommissioning expenses, such as irradiated nuclear fuel management, or site restoration (storm water

management, landscaping, etc.). An arbitrary and capricious decision by Holtec International and SNC-Lavalin, to only clean up radioactive contamination down to a depth of 3 feet beneath ground surface level, and that decision's arbitrary and capricious approval by NRC, are outrageous and unacceptable. All radioactive contamination should be cleaned up, no matter how deeply down it extends. To do otherwise is to doom unsuspecting future generations of people, and other living things, to harm from hazardous radioactive contaminants, generated by Palisades, and simply abandoned in place by Holtec, with NRC's blessing. Besides water flow, there is also a lot of wind-driven erosion of sandy soils at Palisades. This means that any contamination abandoned on site, will simply flow into the environment over time, to harm people and other living things, downwind, downstream, up the food chain, and down the generations, over a very long period of time. Tritium, for example, has a 12.3 year half-life. Its hazardous persistence can be calculated as 10 to 20 half-lives, that is, 123 to 246 years. That's why tritium contamination at Palisades, as documented in Paul Gunter's report cited above, must be completely cleaned up, no matter how far down it goes in the soil and groundwater, or even Lake Michigan sediments or substrate, it goes. Otherwise, it can and will continue to do health damage to humans, and other living things, who/which ingest it, either through food or water, inhalation or absorption through skin, for the next 123 to 246 years after it was generated in the first place. Palisades has also generated other radioactive hazards besides tritium. A comprehensive probe must be conducted, to determine if other, even longer-lasting radioactive hazards have in fact contaminated the Palisades site. Cs-137 has a half-life of 30 years, so a hazardous persistence of 300 to 600 years. Sr-90 has a half-life of 28 years, so a hazardous persistence of 280 to 560 years. Pu-239 has a half-life of 24,000 years, so a hazardous persistence of 240,000 to 480,000 years. If such contaminants exist at the Palisades site, they must be identified, and completely cleaned up, in order to protect the Great Lakes ecosystem, and all the people and living beings who reside there, in both current and future generations.

Sincerely,

Kay Drey, Beyond Nuclear Board of Directors President, University City, MO

and Kevin Kamps, Beyond Nuclear Radioactive Waste Specialist, Takoma Park, MD, & Don't Waste MI Board of Directors Member, representing the Kalamazoo Chapter, kevin@beyondnuclear.org